

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**ESCAPEX IP LLC,  
Plaintiff,**

**v.**

**SPOTIFY USA INC.,  
Defendant.**

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**Civil Action No. 3:22-cv-00963-X**

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Plaintiff EscapeX IP LLC (“EscapeX”) files this Unopposed Motion for Extension of Time for Defendant Spotify USA Inc. (“Spotify”) to Respond to Complaint and respectfully shows the following:

Plaintiff EscapeX filed its Complaint on April 29, 2022 (Dkt. No. 1) and served Defendant Spotify on May 3, 2022. Defendant’s response is due May 24, 2022. Defendant requests a 60 day extension to respond on or before July 23, 2022. Plaintiff conferred with Defendant’s counsel on May 19, 2022. Plaintiff does not oppose this request.

Wherefore, Plaintiff respectfully requests that the Court grant this motion and enter an order extending the deadline for Defendant to answer or otherwise respond to the Complaint to July 23, 2022.

Respectfully Submitted

**Ramey LLP**

/s/William P. Ramey  
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**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rules, William Ramey, counsel for Plaintiff, EscapeX IP LLC conferred with Derek Tang, counsel for Spotify USA Inc. by e-mail on May 19, 2022. Plaintiff is unopposed to the extension.

/s/ William P. Ramey, III  
William P. Ramey, III

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and LR5, I hereby certify that all counsel of record who have appeared in this case are being served on this day of May 20, 2022, with a copy of the foregoing via email.

/s/ William P. Ramey, III  
William P. Ramey, III